

REMARKS

Reconsideration of the application in view of the present amendment is respectfully requested.

Claims 32, 39-42, and 45 are canceled. Applicant reserves right to file divisional applications directed to the subject matter of claims 32, 39-42, and 45.

Claims 33-36, 43, and 44 are pending.

Applicants would like to respectfully point out that the rejection of claims 33-36, 43, and 44 of the present application is improper for the reasons explained hereinbelow.

Claims are directed to "purchasing additional time" not to "receiving payments"

The Office Action states that each of claims 33-36, 43, and 44 is directed to "an automated terminal for receiving payments for a mobile telephone" or "a method of operating a self service terminal directed to receiving payments for a mobile telephone service". However, this is incorrect. Instead, each of claims 33-36, 43, and 44 is directed to self-service terminals at which a user can purchase additional telephone service time for a telephone service account, and methods of operating such self-service terminals [Emphasis added by Applicant].

More specifically, each of claims 33-35 recites, inter alia, "A self-service terminal for enabling a telephone user to purchase additional telephone service time for a telephone service account", claim 36 recites, inter alia, "A self-service terminal for allowing a mobile telephone service user to purchase additional mobile telephone service time for a mobile telephone service account, claim 43 recites, inter alia, "A method of operating a self-service terminal for enabling a telephone user to purchase additional telephone service time for a telephone service account", and claim 44 recites, inter alia, "A method of operating a self-service terminal for allowing a mobile telephone service user to purchase additional mobile telephone service time for a mobile telephone service account". Support for each of claims 33-36, 43, and 44 is found on at least page 6, lines 1-17 of the specification.

The act of "purchasing additional time" is clearly different from the act of "receiving payments". The difference between "purchasing additional time" and "receiving payments" is

not merely semantic, but is fundamental to the claimed invention. The act of purchasing additional time at a self-service terminal involves the terminal not only receiving payments, but also involves the terminal providing a novel function (i.e., enabling a self-service terminal user to purchase additional telephone service time, in the present case) which goes well beyond the terminal just receiving payments.

Prior art does not disclose or suggest "purchasing additional telephone service time"

Applicant would like to respectfully point out that none of the prior art including the article "Billers benefit when the bill's not in the mail" (referred to herein as "the Article") discloses or suggests "purchasing additional telephone service time" as recited in each of claims 33-36, 43, and 44 of the present application.

Prior art Article is irrelevant to the claims of the present invention

The Article relates to electronic bill presentment and payment of bills. None of claims 33-36, 43, and 44 of the present application relates to electronic bill presentment or payment of bills. In fact, in the claimed invention, no bill even exists when a user pays for additional telephone service time for a telephone service account at a self-service terminal, as explained further below.

Webster's dictionary defines "bill", inter alia, as "an itemized account of the separate cost of goods sold, services performed, or work done". Thus, a bill is provided before payment to indicate how much money is due for what has already been sold, performed, or done.

Accordingly, when a user pays a bill for a service at a self-service terminal, the user has already used the service, and the bill informs the user of the amount of money to be paid for the used service. Therefore, it is clear that when a user pays a bill at a self-service terminal, the payment is made for a service that was used up by the user in the past.

However, when a user pays for additional telephone service time for a telephone service account at a self-service terminal, as in the claimed invention, no bill can exist because the purchased additional telephone service time has not yet been used up by the user. The

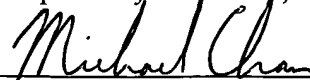
purchased additional telephone service time is for use by the user in the future. Since the purchased additional telephone service time will not be used up by the user until after payment has been made, no bill can exist. Thus, the prior art Article is irrelevant to the claims of the present invention.

If the Examiner continues to reject claims of the present application by applying the Article, it is respectfully requested that the Examiner identify where the Article discloses or suggests self-service terminals at which a user can purchase additional telephone service time for a telephone service account, and methods of operating such self-service terminals. Also, it is respectfully requested that the Examiner explain in detail how the act of a user at a self-service terminal purchasing additional telephone time for a telephone service account is the same as the act of a user at a self-service terminal paying a bill. Absent an adequate showing, it is respectfully submitted the rejection of the claims of the present application is improper and, therefore, should be withdrawn.

This amendment may be entered upon a showing of good reasons why it is necessary and was not presented earlier as per 37 C.F.R. Section 1.116. This amendment is necessary to overcome the rejections stated in the final Office Action. The amendment was not earlier presented because the Applicant did not know of the Examiner's position with respect to rejection of claims in the present application until receiving the final Office Action. Also, by way of the present amendment, withdrawn claims are canceled so that remaining pending claims are in better form for consideration on appeal.

In view of the foregoing, it is submitted that the application is in condition for allowance, and allowance of the application is respectfully requested.

Respectfully submitted,



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